

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

DANIEL HANCHETT, as Personal Representative of the Estate of Shannon Hanchett, Deceased,

Plaintiff,

v.

SHERIFF OF CLEVELAND COUNTY IN HIS OFFICIAL CAPACITY; TURN KEY HEALTH CLINICS, LLC, DIANA MYLES-HENDERSON, LPC, TARA DOTO, LPN, NATASHA KARIUKI, LPN,

Defendants.

Case No. CV-24-87-J

JOINT APPLICATION FOR PROTECTIVE ORDER

COME NOW the parties and respectfully move this Court to enter the Agreed Protective Order, submitted to this Court via email and attached hereto as Exhibit 1. In support of this Application, the parties show this Court as follows:

1. The parties have conferred and agreed to begin discovery in the above-referenced case pursuant to LCvR 26.3(b).
2. As such, the parties are currently engaged in written discovery and document production.
3. Certain documents and information have been requested in this case which one or more of the parties may believe to be confidential.
4. In order to facilitate the free flow of information and protect against the disclosure of information deemed “confidential” to certain persons outside of this case, the parties have agreed to the proposed Agreed Protective Order.

5. A copy of the proposed Agreed Protective Order is attached hereto as Exhibit 1.

WHEREFORE, all premises considered, the parties respectfully request this Court's approval of the proposed Agreed Protective Order, which will be submitted for the Court's consideration via email.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that on the 10th day of June, 2024, I electronically transmitted the above document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the attorneys of record in this matter.

s/ Jessica L. Dark
Jessica L. Dark